

# NOTICE OF COMPLIANCE/NON-COMPLIANCE

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT  
Division of Environment  
Waste Management Program

Initial Inspection: ☒ Yes No Follow-up Inspection: Yes ☒ No Complaint: Yes ☒ No  
Hazardous Waste: LDF ( ) TSF ( ) GEN ( ) KG ( ) SQ ( ) UNV ( ) NOT A GEN ( ) OTHER ( ) \_\_\_\_\_  
Used Oil: UOG ( ) UOT ( ) UOM ( ) UOP ( ) UOB ( )  
Solid Waste: SLF ( ) TRS ( ) CDL ( ) ILF ( ) YWC ( ) SWP ( ) HHW ( ) OBS ( ) MTP ( ) WTM ( ) WTP ( ) WTR ( ) WTT ( )

TO: RINGSIDE MFG 04 / 08 / 07  
 Facility Name  
148105 WEST 105<sup>TH</sup> STREET LENEXA KS 66215-2007 JO  
 Address City State Zip Code County

K	S	R	0	0	0	0	1	4	9	1	0
---	---	---	---	---	---	---	---	---	---	---	---

EPA Identification No.

[illegible]

Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and/or hazardous waste statutes and regulations.

### ☒ Violations As Follows

☐ No Violations Identified

### Citation

Citation

1) KAR 28-31-4 (c)(1)

2) KAR 28-31-4 (k)

3) KAR 28-31-4 (h)(4)

4) KAR 28-31-4 (h)(7)

### Description of Violation

- Inaccurate notification
- Failure to document all required information on weekly inspection log
- Failure to designate emergency coordinator
- Failure to post required emergency information

☐ Other Comments/Concerns:

503666



RCRA

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 30 days of receipt of this notice a description of all corrective actions taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to:  
Victoria S. O'Brien  
Kansas Department of Health and Environment  
Southeast District Office  
Waste Management Program  
150Q W. 7th  
Chanute, Kansas 66720-9701

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (620) 431-2390 or Bureau of Waste Management in the Topeka office at (785) 296-1600.

This Notice was prepared by:

William D. O'Brien

Date 04 / 08 / 09

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: Michael / Davis

Signature: [Signature]

Title: 17-51802

Date: 1/17/70



KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

BUREAU OF WASTE MANAGEMENT  
BUREAU OF ENVIRONMENTAL FIELD SERVICES



**COMPLIANCE INSPECTION CHECKLIST  
HAZARDOUS WASTE COVER PAGE**

**General**

☒ **Routine**

☐ **Complaint**

EPA/ ID/Permit No. KSR 000 014 910 Time 2:00 p.m. Date 04-07-09

Facility Name Ringside MFG District Northeast

Street 14865 West 105<sup>th</sup> Street City Lenexa, KS ZIP 66215-2007

Mailing Address (if different than above) Same

County Johnson Number of Employees <100

Phone (913) 888-7766 Fax 913-888-2198 e-mail doug@ringside.com

Contact(s) Joe Kelly, Doug VanNote, Scott Munro, Inspector(s) Victoria S. O'Brien

Type of Business Manufacturer and Distributor of Boxing and Combat Sports Equipment

Operating Hours and Days Manufacturing 6:30 a.m. - 3:30 p.m. Monday - Friday and Customer Service 8:00 a.m. - 10:00 p.m. (2 shifts) Monday - Friday

Lat/Long Location Method: \_\_\_\_\_ Lat/Long Location Feature: \_\_\_\_\_

Latitude: (e.g. 37.57621) \_\_\_\_\_ Longitude: (e.g. -101.57621) \_\_\_\_\_

Has the Lat/Long been entered in the SW database? Yes ☐ No ☒

**Hazardous Waste Inspection:** ☒ Yes ☐ No

Generator Classification: ☐ Closed/Inactive ☐ Small Qty. Generator ☐ EPA Generator  
☐ Not a Generator ☒ Kansas Generator ☐ Transporter

Other Regulated Activities: ☐ T/S/D Facility ☐ Tank System ☐ Subpart BB  
(complete applicable checklist) ☐ Universal Waste Activities

Has the company declared any information/processes as trade secrets KSA 65-3447? No  
If yes, explain: \_\_\_\_\_

If facility is closed/inactive, or has recently moved please provide a brief description.

**Used Oil Activities:** ☐ Yes ☒ No

Does the facility have a total above-ground storage capacity of used oil (excluding containers less than 55-gallons) of more than 1,320 gallons? ☐ Yes ☐ No ☐ NA

If yes, then the facility is subject to SPCC requirements due to used oil activities.

Does the facility have a SPCC Plan? ☐ Yes ☐ No ☐ NA

**Facility Used Oil Activities (Attach a checklist for each one marked):**

☐ Generator ☐ Collection Center / Aggregation Point  
☐ Transporter / Transfer Facility ☐ Used Oil Processor / Re-Refiner  
☐ Used Oil Burner (Off-Spec Fuel) ☐ Used Oil Marketer

**Attach all applicable checklists.**

# HAZARDOUS WASTE GENERATOR COMPLIANCE INSPECTION CHECKLIST

## WASTE STREAM TABLE

(List all hazardous wastes first, followed by solid wastes.)

Waste Description or Process	Hazardous Waste Codes (or universal, recycled, exempt, or non-hazardous)	Waste Determination Method (process knowledge or analytical data)	Waste Amount Generated Per Month	Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (name of TSDF, MSWLF, recycler, etc.)
Paint Waste – Liquid	D001, D035, F003, F005	Analytical Data	55 Gallons Every 2 to 4 Months	None	Not Applicable	Phillips Environmental
Paint Waste – Solid – Masking Materials, Gloves, Tape, Paper Towels, and Paint Booth Filters	D007, D008, F003, F005	Analytical Data	55 Gallons Per 2 to 3 Months	55 Gallons	01-22-09	Phillips Environmental
Shop Rags	Exempt	Knowledge of Process	<50 Per Week	<50	Not Applicable	G&K
Parts Washer Liquid	Not Applicable	Not Applicable	15 Gallons Per 4 Months	None	Not Applicable	Crystal Clean's Continued Use Program
Screen Printing Wash Down Water	Non-Hazardous	Knowledge of Process	<250 Gallons Per Week	None	Not Applicable	POTW
Cardboard	Non-Hazardous	Knowledge of Process	10 to 12 Bales Per Month	<15 Bales	Not Applicable	Batliner
General Trash	Non-Hazardous	Knowledge of Process	<20 Cubic Yards Per Week	<20 Cubic Yards	Not Applicable	Deffenbaugh

## **RCRA Compliance Evaluation Inspection Summary**

**RINGSIDE MFG**  
14865 West 105<sup>th</sup> Street  
Lenexa, Kansas 66215-2007

**EPA ID No.: KSR 000 014 910**

**Inspection Dates: April 7 and 8, 2009**

**KDHE Inspector: Victoria S. O'Brien**  
**Bureau of Environmental Field Services**  
**Southeast District Office**

### **1.0 INTRODUCTION**

On April 7 and 8, 2009, I conducted a routine compliance inspection at the facility referenced above to determine compliance with the State of Kansas waste regulations. The focus of the inspection was to identify types of wastes generated, points of waste generation, methods of waste management, and review relevant documents. This inspection was conducted under the authority of Kansas Administrative Regulation (K.A.R.) 28-31-12.

The facility manufactures boxing rings, cages, and speed bag platforms and distributes boxing and combat sports apparel and equipment. The facility consists of one building that encompass approximately 126,000 square feet. There is a large parking lot on the west side of the building. The building contains a retail room, lobby area, the administrative offices, warehouse, receiving and shipping areas, a raw material storage area, a manufacturing area, and one paint booth area on the first floor. A second floor located over the retail room, lobby area and administrative office area contains a creative section and a screen printing area. No manufacturing activities occur outside the building.

Based on the waste generation rates identified during the inspection, the facility is a Kansas Generator.

### **2.0 CHANGES SINCE PREVIOUS INSPECTION**

Not applicable, no prior waste compliance inspections have been conducted at the facility.

### **3.0 PREVIOUS VIOLATIONS**

Not applicable, no prior waste compliance inspections have been conducted at the facility.

### **4.0 INSPECTION**

I arrived at the facility at 2:00 p.m. and requested to meet with Steve Francis, the facility's designated hazardous waste contact. The receptionist informed me that Mr. Francis was no longer with the company. I met with Joe Kelly, General Manager. I presented my credentials and discussed the purpose and procedures of the routine compliance inspection. Mr. Kelly introduced me to Doug VanNote, Manufacturing Supervisor. Mr. Kelly and Mr. VanNote explained the facility operations and described the facility's waste streams. I then conducted a walk-through inspection of most of the manufacturing portion of the interior of the facility. Mr. VanNote and Scott Munro, who currently performs all painting operations, accompanied me during the walk-through inspection. The next morning, I finished the walk-through inspection of the manufacturing portion of the facility with Mr. VanNote and Mr. Munro. Mr. VanNote then introduced me to Trenton Travis, Vice President, who accompanied me on the walk through of the creative section and screen printing area.

#### **Retail Room, Lobby, Administrative Offices Area, Creative Area and Warehouse**

No hazardous waste is generated in the retail room, lobby, administrative offices area, creative area, or warehouse area.

#### **Manufacturing**

Metal boxing rings, cages, and speed bag platforms and wood speed bag platforms are manufactured at the site. One paint booth is located in the southeast corner of the manufacturing area (Photo 1). Paint booth filters removed and replaced on an as needed basis are shipped off-site as D007, D008, F003, F005 hazardous waste (Photo 2).

Liquid paint waste (paint and lacquer thinner) generated from cleaning the facility's two working guns and one paint pot is accumulated in a 55-gallon closed head, metal satellite accumulation container located immediately adjacent to the east wall of the paint booth and shipped off-site as D001, D035, F003, F005 hazardous waste (Photo 3).

Solid paint waste generated at the facility includes masking tape, paint booth filters, gloves, and respirator cartridges. The solid paint waste is accumulated in 55-



gallon open head, metal containers. At the time of the inspection, one full storage accumulation container of solid paint waste was located in the facility's designated hazardous waste storage area (Photo 4) and one partial satellite accumulation container of solid paint waste was located immediately adjacent to the east wall of the paint booth (Photo 5).

### **Screen Printing**

Mineral spirits solvent is used in a parts washer to clean wood squeegees used in the screen printing area (Photo 6). Approximately 15 gallons of solvent is removed from the parts washer every four months and managed through Crystal Clean's Continued Use Program. A copy of the facility's Generation Certification form for enrollment in the Continued Use Program is included in this report as Attachment 1.

Wash down water generated from cleaning the screens used in this process is classified as non-hazardous waste and discharged to Lenexa's sanitary sewer system under concurrence received from the city.

### **Perimeter**

No environmental concerns were observed around the perimeter of the buildings.

### **Document Review**

On April 8, 2009, Mr. Kelly provided me with the requested documents for review. I reviewed the following documents: manifests, land disposal restriction notices (LDRs), weekly hazardous waste storage area inspection logs, material safety data sheets (MSDS), notification, analytical results, waste profiles, and annual reports.

No violations were identified during the inspection of the following regulatory areas:

- Pre-Transport Requirements – No violations were identified. The treatment, storage, and disposal facility (TSDF) provides preprinted hazardous waste labels.
- Contractual Agreements - Not Applicable
- Manifests Requirements - I reviewed various past manifests from April 2006 through January 27, 2009. The last manifest reviewed was number 002 454 98 FLE dated January 27, 2009.

- LDR Requirements – The treatment, storage, and disposal facility (TSDF) provides the generator with an LDR notice to complete and return with each shipment. All notices reviewed were satisfactory.
- Special Conditions - Not Applicable.
- Preparedness and Prevention Requirements - All requirements were satisfactory. The fire extinguishers located throughout the facility were last inspected/serviced in August of 2008.
- Hazardous Waste Reporting Requirements:
  - Annual Fees – The annual monitoring fee had been paid for 2007, 2008, and 2009.

## 5.0 DISCUSSION OF VIOLATIONS

**Violation 1. Inaccurate notification in violation of Kansas Administrative Regulations (K.A.R.) 28-31-4(c)(1).** According to information on the most recent Notification of Regulated Waste Activity form submitted by the facility on February 18, 2008, the facility contact was Steve W. Francis and hazardous waste with the EPA waste codes of D001, D035, F003, and F005 were generated at the facility. Based on verbal information obtained from Mr. Travis, Mr. Kelly, and Mr. VanNote during the inspection, Mr. Francis has not been employed at the facility for more than 60 days. In addition, according to the most recent manifest used to ship hazardous waste from the facility, EPA waste codes D007 and D008 also apply to the facility's paint waste solids (Attachment 2).

**Violation 2. Failure to document weekly inspection of container(s) of hazardous waste in accordance with K.A.R. 28-31-4(k).** Mr. Munro conducts weekly inspections of the containers of waste in storage as required, but has not historically documented all required information. Weekly inspection documentation being completed at the facility did not include the name of inspector, complete date of inspection, time of inspection, or the date and nature of remedial actions. A copy of the facility's Waste Storage Daily Log being used to document inspections at the time of the inspection is included in this report (Attachment 3).

**Violation 3. Failure to designate at least one employee as an emergency coordinator in violation of K.A.R. 28-31-4(h)(6).** During the inspection, Mr. VanNote and Mr. Munro told me Steve Francis was the facility's designated emergency coordinator for hazardous waste incidents. However, Mr. Francis has not been employed at the facility for more than 60 days.

**Violation 4. Failure to post emergency information next to at least one telephone accessible, with little or no delay, in an emergency in violation of**

**K.A.R. 28-31-4(h)(7).** During the inspection, I observed the area surrounding the telephone located closest to the facility's designated hazardous waste storage and paint booth areas (Photo 7). None of the required information was posted next to the telephone. When I asked Mr. VanNote and Mr. Munro if the required emergency information was posted next to any other telephone located at the site, they replied no.

## **6.0 EXIT CONFERENCE**

I met with Mr. Travis and Mr. Kelly to discuss the results of the inspection. I discussed the four violations cited and the actions required to correct the violations. Mr. Travis had some questions concerning waste management resources. I provided Mr. Travis with the Bureau of Waste Management (BWM) website address and briefly explained some of the information available on the website. I offered Mr. Travis a copy of the Bureau's Compact Disk (CD) with all BWM handouts and examples, but he declined. At the conclusion of the exit conference, I provided Mr. Travis with a copy of the Notice of Non-Compliance (NONC). I informed Mr. Travis that additional violations could still be identified once the information gathered during the inspection had been reviewed.

## **7.0 LIST OF HANDOUTS PROVIDED TO FACILITY**

A copy of BWM's weekly inspection documentation log was emailed to the facility April 14, 2009.

## **8.0 LIST OF ATTACHMENTS**

Photo Log

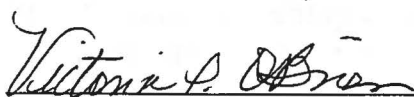
Attachment 1 – Continued Use Program Generator Certification dated 02-07-07

Attachment 2 – Hazardous Waste Manifest 002 454 984 FLE dated 01-27-09

Attachment 3 – Waste Storage Daily Log

## **9.0 SIGNATURE OF AUTHOR/INSPECTOR**

This report was prepared by:



Victoria S. O'Brien



**KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT**  
**DIVISION OF ENVIRONMENT**  
**Bureau of Environmental Field Services**  
**Waste Management Programs**  
**Southeast District Office**



**Photos Have Not Been Altered Except for Size of Photo**

<b>Site Name:</b>	<u>Ringside MFG</u>	<b>Number:</b>	<u>KSR 000 014 910</u>
<b>Address:</b>	<u>14865 West 105th Street, Lenexa, Kansas 66215-2007</u>	<b>Camera:</b>	<u>Sony DSC-P200</u>
<b>County:</b>	<u>Johnson</u>	<b>Taken By:</b>	<u>Victoria S. O'Brien</u>

**Archive Disc File: DSC-FFY09-**



<b>Picture No.:</b>	<u>1</u>
<b>Date:</b>	<u>April 7, 2009</u>
<b>Time:</b>	<u>2:12 p.m.</u>
<b>General Direction Faced:</b>	<u>South</u>
<b>Weather Conditions:</b>	<u>Inside</u>
<b>Location:</b>	<u>Paint Booth</u>
<b>Comments:</b>	<u>View of the facility's paint booth located in the southeast corner of the manufacturing area.</u>

**Archive Disc File: DSC-FFY09-**



<b>Picture No.:</b>	<u>2</u>
<b>Date:</b>	<u>April 7, 2009</u>
<b>Time:</b>	<u>2:13 p.m.</u>
<b>General Direction Faced:</b>	<u>Southwest</u>
<b>Weather Conditions:</b>	<u>Inside</u>
<b>Location:</b>	<u>Paint Booth</u>
<b>Comments:</b>	<u>Close-up of the paint booth's filters.</u>



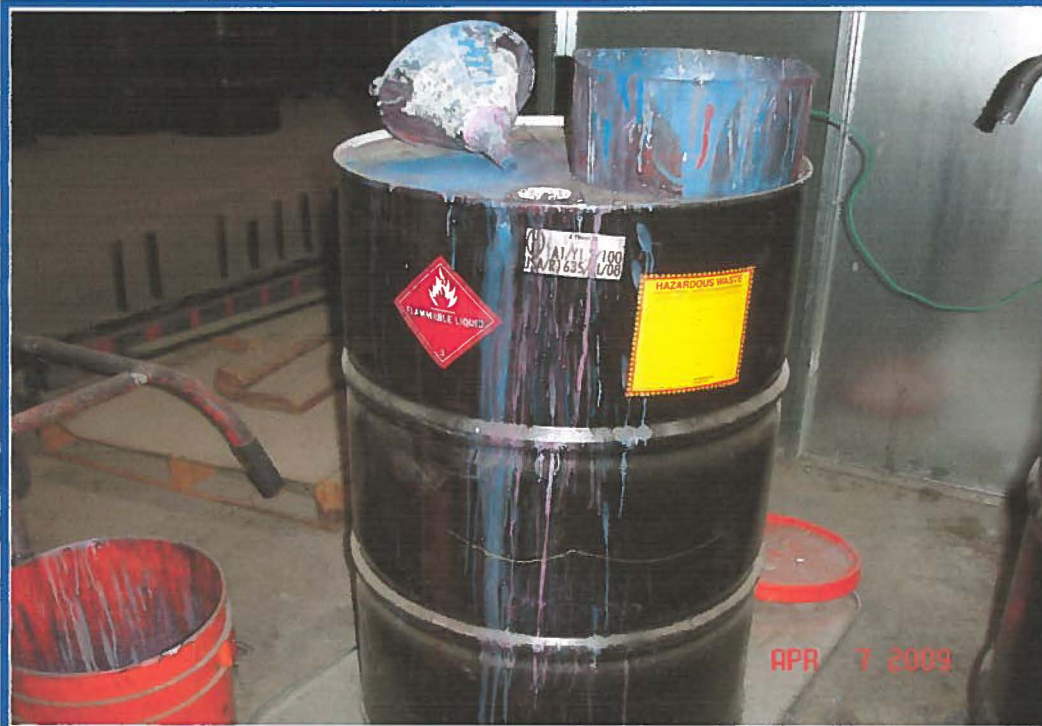
**KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT**  
**DIVISION OF ENVIRONMENT**  
**Bureau of Environmental Field Services**  
**Waste Management Programs**  
**Southeast District Office**



**Photos Have Not Been Altered Except for Size of Photo**

**Site Name:** Ringside MFG **Number:** KSR 000 014 910  
**Address:** 14865 West 105th Street, Lenexa, Kansas 66215-2007 **Camera:** Sony DSC-P200  
**County:** Johnson **Taken By:** Victoria S. O'Brien

**Archive Disc File:** DSC-FFY09-222



**Picture No.:** 3  
**Date:** April 7, 2009  
**Time:** 2:21 p.m.  
**General Direction Faced:** West  
**Weather Conditions:** Inside  
**Location:** Paint Booth Area  
**Comments:**  
Satellite accumulation container of liquid waste generated from cleaning the facility's paint guns and pot.

**Archive Disc File:** DSC-FFY09-223



**Picture No.:** 4  
**Date:** April 7, 2009  
**Time:** 2:21 p.m.  
**General Direction Faced:** South  
**Weather Conditions:** Inside  
**Location:** Hazardous Waste Storage  
**Comments:**  
Storage accumulation container of paint waste solids generated at the facility.



**KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT**  
**DIVISION OF ENVIRONMENT**  
**Bureau of Environmental Field Services**  
**Waste Management Programs**  
**Southeast District Office**



**Photos Have Not Been Altered Except for Size of Photo**

<b>Site Name:</b>	<u>Ringside MFG</u>	<b>Number:</b>	<u>KSR 000 014 910</u>
<b>Address:</b>	<u>14865 West 105th Street, Lenexa, Kansas 66215-2007</u>	<b>Camera:</b>	<u>Sony DSC-P200</u>
<b>County:</b>	<u>Johnson</u>	<b>Taken By:</b>	<u>Victoria S. O'Brien</u>

**Archive Disc File: DSC-FFY09-225**



<b>Picture No.:</b>	<u>5</u>
<b>Date:</b>	<u>April 7, 2009</u>
<b>Time:</b>	<u>2:25 p.m.</u>
<b>General Direction Faced:</b>	<u>North</u>
<b>Weather Conditions:</b>	<u>Inside</u>
<b>Location:</b>	<u>Paint Booth Area</u>
<b>Comments:</b>	<u>Satellite accumulation container of paint waste solids generated at the facility.</u>

**Archive Disc File: DSC-FFY09-228**



<b>Picture No.:</b>	<u>6</u>
<b>Date:</b>	<u>April 8, 2009</u>
<b>Time:</b>	<u>8:10 a.m.</u>
<b>General Direction Faced:</b>	<u>North</u>
<b>Weather Conditions:</b>	<u>Inside</u>
<b>Location:</b>	<u>Screen Printing</u>
<b>Comments:</b>	<u>View of the parts washer used in the facility screen printing area. Solvent generated from use of the parts washer is enrolled in Crystal Clean's Continued Use Program.</u>

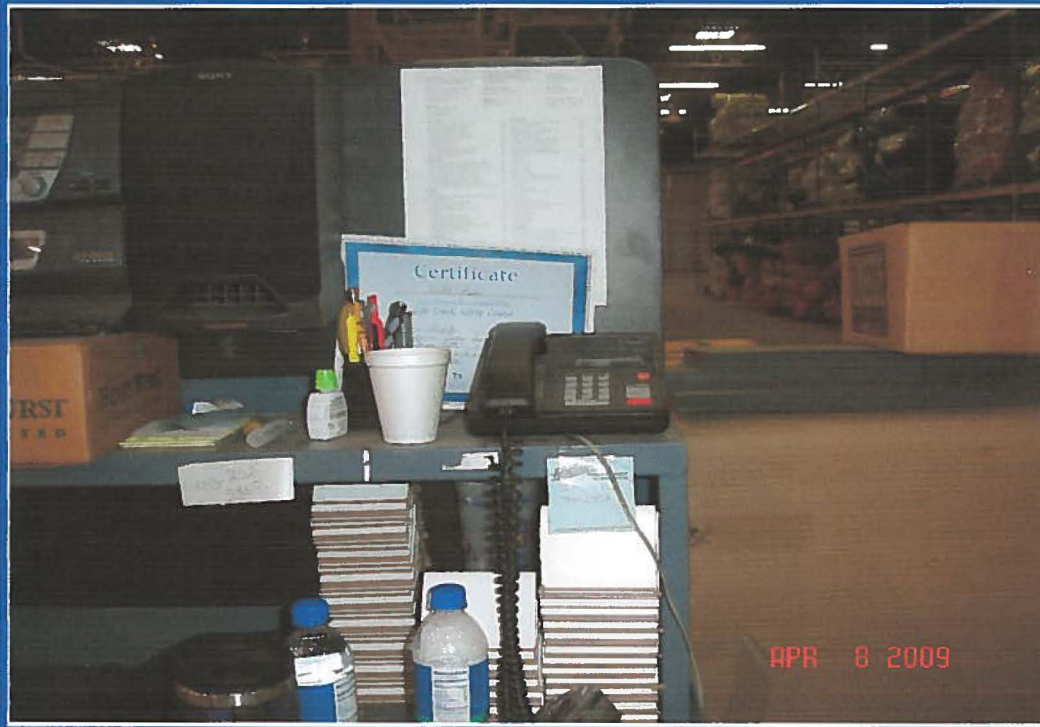
**KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT**  
**DIVISION OF ENVIRONMENT**  
**Bureau of Environmental Field Services**  
**Waste Management Programs**  
**Southeast District Office**



**Photos Have Not Been Altered Except for Size of Photo**

**Site Name:** Ringside MFG **Number:** KSR 000 014 910  
**Address:** 14865 West 105th Street, Lenexa, Kansas 66215-2007 **Camera:** Sony DSC-P200  
**County:** Johnson **Taken By:** Victoria S. O'Brien

**Archive Disc File:** DSC-FFY09-226



Picture No.:	<u>7</u>
Date:	<u>April 8, 2009</u>
Time:	<u>7:47 a.m.</u>
General Direction Faced:	<u>West</u>
Weather Conditions:	<u>Inside</u>
Location:	<u>Manufacturing</u>
Comments:	<u>None of the required emergency response information was posted next to the phone accessible in an emergency.</u>

**ATTACHMENT 1**



USE ONLY

HCC Generator #: 50405



HCC Service Agreement #: 433706

## HERITAGE-CRYSTAL CLEAN, LLC ("HCC") GENERATOR CERTIFICATION

<u>Ringside</u> (Customer)			Customer's EPA ID#: _____		
<u>9650 Dice Lane</u> (Address)			Customer's State ID# (if applicable): _____		
<u>Ceneca</u> (City)	<u>KS</u> (State)	<u>66215</u> (Zip Code)	<u>(913) 888-7766</u> (Phone Number)		

THIS FORM IS DEEMED PART OF THE ABOVE REFERENCED SERVICE AGREEMENT BETWEEN HERITAGE-CRYSTAL CLEAN, LLC AND THE IDENTIFIED CUSTOMER AND ALL TERMS AND CONDITIONS AND CERTIFICATIONS CONTAINED THEREIN ARE DEEMED A PART HEREOF.

### ALL SERVICES

☒ **Conditionally Exempt Small Quantity Generator (CESQG)** (or state equivalent designation)

The Customer hereby certifies that it qualifies as a Conditionally Exempt Small Quantity Generator by generating less than 100 kilograms (approximately 28 gallons) of characteristic (D codes), F, K, or U-listed hazardous waste during a calendar month, and less than one kilogram (approximately 2.2 pounds) of acute hazardous (P-listed) waste during a calendar month.

The Customer also certifies that no more than 1,000 kilograms of characteristic F, K, or U-listed hazardous waste and no more than one kilogram of acute hazardous waste was accumulated on-site at any one time during a calendar month. The Customer will inform HCC if more than 1,000 kilograms of characteristic F, K, or U-listed hazardous waste or more than one kilogram of acute hazardous waste is accumulated on-site at any one time during a calendar month.

☐ **Generator Does NOT Qualify as Conditionally Exempt Small Quantity Generator**

The Customer hereby certifies that it qualifies as:

☐ **Small Quantity Generator (SQG)**  
 > 100 kg / 220 lbs. Per month and  
 < 1000 kg / 2200 lbs. Per month

or

☐ **Large Quantity Generator (LQG)**  
 > 1000 kg / 2200 lbs. Per month

AK **GENERATOR'S QUANTITY CERTIFICATION**  
 (Initials)

### PARTS CLEANER SERVICES

Customer represents, warrants and certifies as follows:

The Parts Cleaner fluids are generated in Customer's business operations without Customer adding any additives or other materials to the fluids and the fluids do not include any waste generated by any other person or any other business operation.

Customer understands that any Parts Cleaner fluids tendered to HCC for pickup have not been mixed with any materials regulated as hazardous waste under RCRA, or any polychlorinated bi-phenyls (PCBs) or other materials regulated under TSCA and all constituents present in such fluids are contaminants resulting from, and incidental to, normal use of the fluids as a degreaser or cleaner and any failure of these Certifications to be true and accurate may result in its fluids being classified as hazardous waste subject to federal and state laws and regulations.

☒ **Non-Hazardous Parts Cleaner Program Certification**

Customer hereby certifies that it qualifies for HCC's Non-Hazardous Parts Cleaner Program and understands that the HCC degreasing/cleaning fluids picked up by HCC may be managed as a non-hazardous waste.

☒ **Reuse Program Certification**

Customer hereby certifies that it qualifies for HCC's Reuse Program and understands that the HCC degreasing/cleaning fluids picked up by HCC may be utilized as an effective substitute for a commercial chemical product.

In the event of any breach of this Certification or if analytical results determine that the fluids do not qualify, said determination in HCC's sole discretion, HCC retains the right to disqualify the fluids from either the Non-Hazardous Parts Cleaner or Reuse Program in which case, Customer will be obligated to pay for testing, management and disposal of the fluids as hazardous waste. The person signing this Certification has reviewed the Customer's facilities, administrative practices and operational procedures (or has directed the completion of such review by others) and based upon such review, is willing to make this true, accurate and complete Certification.

AK **SOLVENT USE CERTIFICATION**  
 (Initials)

### USED OIL/VACUUM SERVICE

Customer acknowledges that HCC may, but is not required to, retain samples of materials, which may be used to confirm contaminants in said materials.

Customer represents, warrants and certifies that the waste materials described in this Agreement for these services meets the definition of used oil in 40 CFR 279 ("Used Oil means any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result for such use is contaminated by physical or chemical impurities") and has not been mixed with other regulated materials, including but not limited to polychlorinated bi-phenyls (PCB's), other materials regulated under TSCA, or hazardous waste, and recognizes that HCC is relying on this Certification to properly manage these waste materials, and in the event that this Certification is untrue, Customer accepts complete responsibility for all costs related to the proper management and disposal of the waste materials and any commingled materials.

Customer acknowledges that the Used Oil will be co-mingled by HCC with used oil from third parties and that in the event the Used Oil is found to be non-conforming, either before or after said co-mingling, HCC may refuse to accept or revoke its prior acceptance of the Used Oil and Customer's indemnification in the Service Agreement shall apply to said non-conforming Used Oil and other used oil received from other parties which is affected thereby.

**USED OIL CERTIFICATION**

Customer hereby agrees to immediately notify HCC of any facts that would result in a change as to the truth, accuracy or completeness of the above Certification or any prior Certifications of the Customer. These Initialed Certifications hereinabove supersede all prior Certifications as to the Certification subject matter, but no other Certifications. The signature below applies to all of the Certifications Initialed hereinabove by the Customer.

Adam Rouchka  
 (Printed Name of Responsible and Authorized Party)

[Signature]  
 (Signature)

2-7-07  
 (Date)



## **ATTACHMENT 2**

... designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

<b>HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>KSR0000014910</b>	2. Page 1 of <b>1</b>	3. Emergency Response Phone <b>1-877-4-BXING</b>	4. Manifest Tracking Number <b>002454984 FLE</b>		
5. Generator's Name and Mailing Address <b>RINGSIDE MANUFACTURING 14865 W. 105TH LENEXA KS 66215 (913)888-7766</b> Generator's Phone:			Generator's Site Address (if different than mailing address) <b>RINGSIDE MANUFACTURING 14865 W. 105TH LENEXA KS 66215 (913)888-7766</b>				
6. Transporter 1 Company Name <b>NOETRU, LLC</b>			U.S. EPA ID Number <b>MID021087275</b>				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address <b>Solvent Recovery, LLC 716 Mulberry St. Kansas City, MO 64101 (800) 765-8132</b> Facility's Phone:			U.S. EPA ID Number <b>MCD000610766</b>				
GENERATOR	9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
			No.	Type			
	X	1. UN1263 WASTE PAINT RELATED MATERIAL 3 PGII RQ(D601)		DM		P	D061 D065 P003
	X	2. UN1325 WASTE FLAMMABLE SOLIDS, ORGANIC, N.O.S. (ACETONE, TOLUENE) 4.1 PGII RQ(P003)	2	DM	75	P	P005 D007 D008 P003
		3.					
		4.					
14. Special Handling Instructions and Additional Information <b>(1) 303735-00 - EWG(123) PAINT AND SOLVENT (2) 303697-00 - ERG(131) PAINT BOOTH FILTERS</b>							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name <b>ANDREW D WELSH</b>			Signature <i>Andrew D Welsh</i>			Month Day Year <b>10 17 09</b>	
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name <b>Randy Johnson</b> Signature <i>Randy Johnson</i> Month Day Year <b>1 27 09</b> Transporter 2 Printed/Typed Name _____ Signature _____ Month Day Year _____						
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____ U.S. EPA ID Number _____						
	18b. Alternate Facility (or Generator) _____ U.S. EPA ID Number _____ Facility's Phone: _____						
	18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. <b>H061</b>		2. <b>H141</b>		3. _____		4. _____	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name <b>Andrew T. Gurn</b> Signature <i>Andrew T. Gurn</i> Month Day Year <b>11 28 09</b>							

## **ATTACHMENT 3**

# DAILY LOG

[illegible]